

1 Anna Maria Martin (Nevada Bar No. 7079)
amartin@mmhllp.com
2 MESERVE, MUMPER & HUGHES LLP
800 Wilshire Boulevard, Suite 500
3 Los Angeles, California 90017-2611
Telephone: (213) 620-0300
4 Facsimile: (213) 625-1930

5 Wendy L. Furman
Wendy.furman@emhllp.com
6 EDISON, MCDOWELL & HETHERINGTON LLP
2101 N.W. Corporate Boulevard
7 Suite 316
Boca Raton, Florida 33431
8 Telephone: (561) 994-4311
Facsimile: (561) 982-8985

9 ***PRO HAC VICE APPLICATION PENDING***

10 Attorneys for Defendant
11 THE LINCOLN NATIONAL LIFE INSURANCE
COMPANY
12

13 **CONTINUED ON SECOND PAGE**

14
15 **UNITED STATES DISTRICT COURT**
16 **DISTRICT OF NEVADA**

17 RICK ERDMANN,
18 Plaintiff,

19 vs.

20 THE LINCOLN NATIONAL LIFE
21 INSURANCE COMPANY,
22 Defendant.

) Case No. 2:17-cv-2383-JAD-PAL

) **STIPULATION TO EXTEND**
) **TIME FOR DEFENDANT TO**
) **RESPOND TO PLAINTIFF'S**
) **COMPLAINT**

1 Robert J. Rosati (Bar No. 112006)
2 robert@erisalg.com
3 6485 N. Palm Avenue, Suite 105
4 Fresno, California 93704
5 Telephone (559) 478-4119
6 Facsimile: (559) 478-5939

7 ***PRO HAC VICE APPLICATION PENDING***

8 Trevor Hatfield (Nevada Bar No. 7373)
9 thatfield@hatfieldlawassociates.com
10 HATFIELD LAW ASSOCIATES
11 703 S. Eighth Street
12 Las Vegas, NV 89101
13 Telephone: (702) 388-4469
14 Facsimile: (702) 684-5147

15 Attorneys for Plaintiff
16 RICK ERDMANN

17 IT IS HEREBY STIPULATED by and between the parties hereto through
18 their respective attorneys that defendant THE LINCOLN NATIONAL LIFE
19 INSURANCE COMPANY may have an additional three weeks within which to
20 answer or otherwise respond to plaintiff's complaint. The last day for defendant to
21 answer or otherwise respond to plaintiff's complaint is November 3, 2017.

22 Good cause exists for this request as counsel for defendant has only recently
23 been retained in this matter and needs additional time to complete a full review
24 before providing an answer or otherwise respond to plaintiff's complaint. This
25 extension will not affect any existing deadline already scheduled by the Court. This
26 is the first extension to answer or otherwise respond to plaintiff's complaint.

27 This document is being electronically filed through the Court's ECF System.
28 In this regard, counsel for Defendant hereby attests that (1) the content of this
document is acceptable to all persons required to sign the document, (2) Plaintiff has

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1 concurred with the filing of this document; and (3) a record supporting this
2 concurrence is available for inspection or production if so ordered.

3 Dated: October 13, 2017

Robert J. Rosati

4 Trevor Hatfield
5 Hatfield Law Associates

6 By: /s/ Trevor Hatfield

7 Trevor Hatfield
8 Attorneys for Plaintiff
9 RICK ERDMANN

10 Dated: October 13, 2017


Anna Maria Martin
MESERVE, MUMPER & HUGHES LLP

11 Wendy L. Furman
12 EDISON, MCDOWELL & HETHERINGTON
13 LLP

14 By: /s/ Anna Maria Martin

15 Anna Maria Martin
16 Attorneys for Defendant
17 THE LINCOLN NATIONAL LIFE
18 INSURANCE COMPANY

19 **IT IS SO ORDERED** this 18th day
20 of October, 2017.

21 

22 Peggy A. Leen
23 United States Magistrate Judge